2022–25
Accessibility Plan

**Office of the Public Sector Integrity
Commissioner of Canada**

This document is available on the Office of the Public Sector Integrity Commissioner's website at: https://www.psic-ispc.gc.ca/en/corporate-publications

You may request a copy of this document in alternate formats (print, large print, Braille, audio format or electronic format) using the contact information below:

Email: accessible@psic-ispc.gc.ca

Telephone:

- 613-941-6400
- 1-866-941-6400 (toll-free in Canada)

In-person or by mail:

Accessibility Representative
Office of the Public Sector Integrity Commissioner of Canada
60 Queen Street, 4th Floor
Ottawa, Ontario K1P 5Y7

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General

We invite employees and other persons who have dealt with the Office of the Public Sector Integrity Commissioner of Canada (PSIC) to provide accessibility-related feedback using the contact information below. You may include your contact information to receive an acknowledgment or share your feedback anonymously. The Accessibility Representative is the person designated to receive feedback.

You may also use the contact information below to request a copy of the accessibility plan in alternate formats (print, large print, Braille, audio format or electronic format).

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From the Commissioner

I am pleased to present PSIC's 2022–25 Accessibility Plan (the Plan) prepared in accordance with the *Accessible Canada Act*. The Plan anchors PSIC's long-standing commitment to accessibility by outlining carefully selected objectives and supporting actions.

The objectives and supporting actions included in the Plan were identified through a comprehensive review of PSIC's internal and external activities, research on best practices, a scan of existing Government of Canada policies and standards, and consultations with employees and persons with disabilities. We have brought into focus key priorities including accessibility awareness, workplace accommodations, the built environment, and website accessibility.

While necessarily a "work in progress", the Plan includes supporting actions that we consider effective and efficient means of improving accessibility. In this way, the Plan's implementation will support PSIC's core mandate of investigating and reporting on disclosures of wrongdoing and complaints of reprisal by improving access to our services for public servants and members of the public with disabilities.

I look forward to implementing the Plan and to annually reporting on our progress.

Consultations

The information gathered during internal and external consultations, including consultations with persons with disabilities, has directly informed many of the objectives and supporting actions identified in the Plan.

Internal Consultations

Nearly all employees participated in small group workshops designed to raise awareness about the *Accessible Canada Act* and gather accessibility-related information.

During these facilitated workshops, employees were asked to identify the various points of contact that they have with external stakeholders, consider the barriers that individuals with various types of disabilities might encounter in those points of contact, and identify actions to prevent and/or remove those barriers. Employees were also asked to identify barriers that they could encounter in the workplace and identify actions to prevent and/or remove those barriers. These workshops therefore allowed us to comprehensively consider PSIC's activities and identify priorities for the Plan.

The employee workshops also formed part of our consultation with persons with disabilities. Between 5 and 10 employees stated in an anonymous survey distributed during the workshops that they have a disability; however, the specific number is purposely omitted from the Plan given the small number of employees at PSIC. Some of these employees publicly identified themselves during the workshops and discussed their lived experience, particularly in relation to culture, workplace accommodations, and the built environment.

External Consultations

Given that PSIC's website is the primary means by which most disclosers or complainants find information about PSIC's services and access these services, we also conducted targeted external consultations with persons who have visual impairments and rely on screen-reader technology.

Specifically, we held two-hour sessions during which a participant was asked to complete a number of tasks, including: finding and completing a disclosure form; finding and completing a form to request funding for legal advice; finding contact information; finding general information about disclosures; and, finding news releases. We held one session with an individual using a Windows OS and a second session with a different individual using an Apple OS.

These targeted external consultations allowed us to obtain feedback on the usability of PSIC's website. The participants provided positive feedback on certain aspects of the website and stated that, overall, PSIC's website is accessible to persons who rely on a screen reader. However, they also identified certain specific accessibility issues to be resolved.

The information gathered during these external consultations has directly informed many of the actions included in the "Information and Communication Technologies" section of the Plan.

Priority Areas

PSIC has identified objectives and actions to improve accessibility in eight priority areas: culture; employment; built environment; procurement of goods, services and facilities; information and communication technologies; communication, other than information and communication technologies; design and delivery of programs and services; and, transportation.

We have included culture as a priority area, although it is not required by the *Accessible Canada Act*, as it is foundational to improving accessibility.

Culture

Our overarching objective is to foster a culture of inclusion and equity at PSIC for the benefit of employees and external stakeholders. In support of this objective, we have decided to focus on the following in this first Plan:

- Raising accessibility awareness so that we can proactively identify, remove, and prevent barriers for employees and external stakeholders;
- Recognizing attitudinal barriers and uncovering unconscious biases, as these may exacerbate other barriers by discouraging persons with disabilities from expressing their needs; and,
- Actively soliciting feedback from persons with disabilities so that we are informed and guided by their lived experiences. Our consultations revealed that this is not only an effective means of identifying barriers and solutions, but it also has the potential to build trust and a sense of belonging if feedback is meaningfully considered.

Objective A: PSIC encourages employees to develop their accessibility awareness, recognize attitudinal barriers, and uncover unconscious biases.

Supporting Actions

- Include an accessibility training requirement into all employees' annual requirements, which incorporates training related to attitudinal barriers and unconscious biases.
- Maintain an Intranet page on accessibility that provides various resources, including a list of general and specialized accessibility training.
- Leverage learning events hosted by the Mental Health Committee to raise awareness of mental health disabilities among employees.

Objective B: PSIC actively solicits feedback from persons with disabilities, whether they are employees or external stakeholders, and feedback is meaningfully considered.

Supporting Actions

- Solicit accessibility-related feedback from external stakeholders (i.e. disclosers, complainants) by providing information about the feedback process established in accordance with the *Accessible Canada Act*.
- Invite employees to use the feedback process established in accordance with the *Accessible Canada Act*, and provide details regarding how they can provide feedback anonymously.
- Report to the Executive Committee on accessibility-related feedback at least bi-annually.

Employment

PSIC is committed to fostering a more inclusive and diverse workplace by implementing strategies to identify, remove, and prevent barriers in recruitment, retention and promotion of persons with disabilities.

The specific objectives and supporting actions outlined below are guided by information gathered during PSIC's internal consultations and consultations conducted by the Treasury Board of Canada when developing the *Accessibility Strategy for the Public Service of Canada*, as well as the Public Service Commission's *Audit of Employment Equity Representation in Recruitment*.

We found during internal consultations that employees would be reluctant to make accommodation requests and that employees with disabilities consider the process unnecessarily intrusive. These concerns seemed to be grounded in a general unease rather than specific experiences at PSIC. Employees and management showed great

interest in the [Workplace Accessibility Passport](#) established by the Treasury Board of Canada.

Objective A: Employees and candidates consider that the workplace accommodations process is respectful and efficient, and that it meets their needs as much as possible.

Supporting Actions

- Pilot the [Workplace Accessibility Passport](#) as a communication tool for employees and managers to exchange accommodation-related information.
- Include an accommodation-related training requirement into all managers' performance agreements.
- Consider establishing a workplace accommodation policy that sets out which member(s) of the management team an employee should approach with an accommodation request and includes a mechanism to track accommodation-related information (number of requests; rejected/refused requests; accommodation type; formal assessments by a medical doctor or specialist; cost; number of days between the request and full implementation of accommodation).

Objective B: PSIC is proactive about the recruitment and retention of persons with disabilities.

Supporting Actions

- Explore hiring students with disabilities through the [Federal Student Work Experience Program](#), [Federal Internship Program for Canadians with Disabilities](#), or similar programs.
- Develop incentives, such as flexible work arrangements and work-sharing opportunities, to support the recruitment and retention of employees with disabilities.
- Monitor development of standards by [Accessibility Standards Canada](#) regarding employment, as this has been identified as a priority area by that organization.

Built Environment

PSIC recognizes that, in accordance with the [*Directive on the Management of Real Property*](#), it is responsible for providing barrier-free access to its offices. We are committed to meeting the requirements of this standard and to proactively identifying and removing other barriers in the built environment.

During internal consultations, employees with disabilities identified certain barriers related to the built environment. These have been listed as high priority issues below.

Objective A: High priority accessibility issues identified during internal consultations are addressed as quickly as possible.

Supporting Actions

- Address accessibility of PSIC main entrance doors and bathroom doors.
- Ensure that all current emergency evacuation procedures enable the safe and efficient evacuation of persons with disabilities, including persons with mobility, auditory and/or visual impairments.
- Establish a quiet, closed-door space with adjustable lighting that employees without a closed-door office can reserve.

Objective B: PSIC's offices are accessible to employees and external stakeholders.

Supporting Actions

- Monitor the development of standards by Accessibility Standards Canada regarding emergency egress, as this has been identified as a priority area by that organization.
- In consultation with persons with disabilities, conduct an accessibility audit of PSIC's offices to ensure compliance with the *Directive on the Management of Real Property*.

Procurement of Goods, Services and Facilities

PSIC is committed to ensuring that any goods, services or facilities that it procures are inclusive by design and accessible by default. We also recognize that, in accordance with the *Directive on the Management of Procurement*, we must consider accessibility criteria and features when procuring goods or services.

No barriers relating to the procurement of goods, services and facilities were identified during consultations.

Objective A: PSIC implements practices to ensure that goods, services and facilities procured are accessible.

Supporting Actions

- Consider incorporating standard accessibility language developed by the Accessibility, Accommodation and Adaptive Computer Technology (AACT) program at Shared Services Canada into procurement templates.
- Clearly define and identify accessibility requirements in tenders, requests for proposals and contracts.

- Monitor the development of standards by [Accessibility Standards Canada](#) regarding procurement, as this has been identified as a priority area by that organization.

Information and Communication Technologies

Given that PSIC's website is the primary means by which most disclosers or complainants find information about PSIC's services and access these services, we have decided to focus on website accessibility under this priority area.

As required by the *[Standard on Web Accessibility](#)*, PSIC has worked with its external web developer to ensure that its public-facing website meets Level AA conformance with the Web Content Accessibility Guidelines (WCAG 2.0). Nonetheless, as explained in the Consultations section above, persons with disabilities who rely on screen-reader technology identified certain accessibility-related issues with PSIC's website.

Furthermore, employees noted during internal consultations that PSIC's general inquiry line does not support teletypewriter (TTY) technology.

Objective A: PSIC's current website is accessible to persons with disabilities, including those who rely on screen-reader technology.

Supporting Actions

- Compile a list of accessibility issues identified during external consultations and address these issues as quickly as possible (i.e. use of headings and lists, descriptive text is used for links, links are properly labelled, issues with the cookies banner so that all content can be accessed).
- Include an accessibility statement on PSIC's website.
- Continue to provide sign-language translation of videos in ASL and LSQ.
- Closely monitor for revised guidance on website accessibility from Treasury Board Secretariat and monitor the development of standards by [Accessibility Standards Canada](#) regarding website accessibility.

Objective B: Incorporate accessibility into PSIC's planned website redesign.

Supporting Actions

- Research best practices with respect to accessible information and communication technology procurement, including guidance prepared by the [Accessibility, Accommodation and Adaptive Computer Technology](#) (AACT) program at Shared Services Canada.
- Ensure that accessibility requirements are clearly defined and identified in procurement documents relating to the website redesign, including requirements relating technical compliance with specified standards and user testing.

- Research best practices with respect to accessible web design, including use of plain language, logical flow, alternative text with images, font considerations (i.e. size and contrast), and colour contrasting. Incorporate these best practices into the website redesign.

Objective C: External stakeholders can use the general inquiry line to communicate with PSIC.

Supporting Action

- Ensure that the general inquiry line supports teletypewriter (TTY) technology.

Communication, other than Information and Communication Technologies

PSIC produces a significant volume of written documentation in relation to disclosures and reprisal complaints, including decision letters, investigation reports, and report summaries. We are committed to encouraging the use of plain language as much as possible, while meeting applicable legal requirements. However, employees noted during internal consultations that use of complex or legalistic language is a potential barrier.

Furthermore, PSIC produces outreach documentation that may not be accessible to persons with disabilities, and employees participate in outreach events. We are committed to ensuring that all public servants, regardless of ability, have access to information about our services.

Objective A: The use of plain language is encouraged for all types of written documentation, including documentation relating to disclosures and complaints, internal documentation, and outreach documentation.

Supporting Actions

- Monitor the development of standards by [Accessibility Standards Canada](#) regarding plain language, as this has been identified as a priority area by that organization.
- Research best practices regarding the use of plain language and develop specialized guidance for employees involved in case admissibility analyses, investigations and communications.

Objective B: PSIC documentation is prepared in accessible formats.

Supporting Actions

- Conduct an accessibility review of current internal and external templates to ensure they are accessible.
- Conduct an accessibility review of current outreach documentation to ensure all products are accessible.
- Continue to provide documentation in alternate formats on request (large print or electronic format).

Design and Delivery of Programs and Services

PSIC investigates wrongdoing in the federal public sector and helps protect from reprisal whistleblowers and those who participate in investigations. Through its activities, PSIC regularly interacts with disclosers, reprisal complainants, reprisal respondents and witnesses, some of whom are persons with disabilities.

Employees stated during internal consultations that PSIC generally grants any accommodation requests received by persons involved in disclosures or reprisal complaints, but that it does not proactively offer the opportunity to make requests. Some employees also stated that lack of training on how to interact with individuals who have mental health disabilities may cause barriers.

Objective A: The disclosure and complaints processes are accessible to persons with disabilities.

Supporting Actions

- Modify the disclosure forms, reprisal complaint forms, forms to request funding for legal advice, and interview invitation letters to offer persons the opportunity to make accommodation requests.
- Research existing training programs on interacting with persons with disabilities and include them on the Intranet page on accessibility.

Transportation

No barriers relating to transportation were identified during consultations. Nonetheless, PSIC has identified one objective and one action in support of its commitment to ensuring that employees do not face barriers when travelling for work.

Objective A: PSIC employees are aware that transportation service providers have accessibility-related obligations and make accommodation requests as needed when travelling for work.

Supporting Action

- Inform employees on the Intranet page on travel that they can make accommodation requests directly with transportation service providers as needed.